

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARTIN LUTHER KING, JR.
COUNTY, et al.,

Plaintiffs,

v.

SCOTT TURNER in his official capacity
as Secretary of the U.S. Department of
Housing and Urban Development, et al.,

Defendants.

No. 2:25-cv-00814-BJR

DECLARATION OF DR.
OLUSIMBO IGE

I, DR. OLUSIMBO IGE, declare as follows:

1. I am a resident of the City of Chicago in the State of Illinois. I am over the age of 18. The statements contained in this declaration are based on my personal knowledge, information provided to me in the performance of my job duties, and my review of business records. If called as a witness, I could and would testify competently to the matters set forth below.

2. I currently serve as Commissioner of Chicago's Department of Public Health ("CDPH"). I have held this position since December 2023. Before my appointment as CDPH Commissioner, I served as the Managing Director of Programs at the Robert Wood Johnson Foundation. There, I oversaw partnerships with health organizations nationwide working towards making public health and health care systems accountable and equitable. Previously, I served as the Assistant Commissioner for the New York City Department of Health and Mental Hygiene,

1 where I provided oversight to a wide range of programs, including New York City's pandemic
2 response, food security programs, housing and health initiatives, mental health programs, violence
3 prevention, and the Public Health Corps initiative.

4 3. I have a Bachelor of Medicine and Surgery and a Master of Science degree in
5 Epidemiology and Biostatistics from the University of Ibadan in Nigeria. I received a Public Health
6 Master's degree from the University of Manchester in the United Kingdom.

7 4. As Commissioner of CDPH, I make strategic decisions, in collaboration with the
8 Mayor's Office and stakeholders across the City, to manage public health threats; design and
9 deliver disease control services; and protect the food, air, and environment for 2.7 million Chicago
10 residents.¹ I serve as a liaison and subject matter expert on all related policy matters, and use of
11 authorities and resources to promote and protect public health. I have built and currently manage
12 an executive team of ten professionals, a FY25 budget of \$689M, and approximately 740
13 employees, with a dedication to sustaining a strong public health workforce and capacity.

14 5. CDPH's overarching mission is to work with communities and partners to create
15 an equitable, safe, resilient, and healthy Chicago. The Department operates seven mental health
16 centers that provide low-barrier services to uninsured and underinsured Chicago residents, four
17 immunization clinics, and three clinics that provide free testing and treatment for sexually
18 transmitted infections. The City also provides certain at-home and in-field health programs, such
19 as nursing home support for pregnant people and newborn babies and directly observed therapy
20 for tuberculosis. Additionally, the Department funds and staffs a network of Women, Infants, and
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¹ U.S. Census Bureau QuickFacts (V2024).
<https://www.census.gov/quickfacts/fact/table/chicagocityillinois/HSG010224>.

1 Children (WIC) clinics providing nutrition counseling and supplemental food to pregnant, post-
 2 partum and breastfeeding women, their infants and children.

3 6. CDPH relies heavily on funding from the U.S. Department of Health and Human
 4 Services (“HHS”), through a mix of direct and pass-through grants, to provide these essential
 5 health services to Chicago’s residents. CDPH’s FY2025 budget includes \$439,023,000 in both
 6 carry-over and new grant awards from HHS, comprising almost 64% of CDPH’s annual budget.

7 7. The grants CDPH receives from HHS include funding for programs, such as
 8 immunization and vaccines for children; injury prevention and control research; lead poisoning
 9 surveillance; sexually transmitted disease prevention; maternal and child health; epidemiology
 10 laboratory capacity, and adult viral hepatitis.

11 8. For example, CDPH receives the following two grants from the HHS-Health
 12 Resources and Services Administration (HRSA):

13 a. **HIV Emergency Relief Project.** This grant supports clinical and non-
 14 clinical services for people with HIV including primary care, oral health,
 15 mental health, substance use, food distribution, legal services related to
 16 taxes and more, psychosocial support, case management, identification of
 17 people with new diagnoses, and linkage to clinical and non-clinical
 18 supportive services. CDPH received an FY2024 award of \$27,817,885.

19 b. **Ending the HIV Epidemic: A Plan for America — Ryan White**
 20 **HIV/AIDS Program Parts A and B.** This grant support efforts to identify
 21 people with HIV who are not engaged in medical care and create new,
 22 innovative, and tailored services to help engage individuals into care so that
 23 they may become adherent to medical treatment which leads to lowered
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1 levels of HIV in their systems which removes the concern of transmitting
2 HIV to another individual through sex. CDPH received a Fiscal Year 2024
3 award of \$4,653,437.

4 9. With funding from these two grants, the Department served approximately 23,739
5 Chicagoans from March 1, 2024 to February 28, 2025. Without these funds, CDPH would not be
6 able to support the provision of core medical services and support services that enable people with
7 HIV to access and remain in HIV primary medical care to improve their medical outcomes. These
8 grants contribute to a system of clinical and supportive services for the jurisdiction. Not receiving
9 these funds would destabilize this system and lead to an increase of new HIV infections.
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14 I declare under penalty of perjury that the foregoing is true and correct.

15 EXECUTED this 8th day of July, 2025.

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19 DR. OLUSIMBO IGE
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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2025, I served a true and correct copy of the foregoing document on the following parties by the method(s) indicated below:

Brian C. Kipnis Annalisa L. Cravens Sarah L. Bishop Rebecca S. Cohen <i>Assistant United States Attorneys</i> Office of the United States Attorney 700 Stewart Street, Suite 5220 Seattle, WA 98101-1271 brian.kipnis@usdoj.gov annalisa.cravens@usdoj.gov sarah.bishop@usdoj.gov rebecca.cohen@usdoj.gov <i>Attorneys for Defendants</i>	<input checked="" type="checkbox"/> CM/ECF E-service <input type="checkbox"/> Email <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Certified Mail / Return Receipt Requested <input type="checkbox"/> Hand delivery / Personal service
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I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 14th day of July, 2025.

/s/ Gabriela DeGregorio

Gabriela DeGregorio
 Litigation Assistant
 Pacifica Law Group LLP